

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**IN RE THE MATTER OF
THE SEARCH OF FAST CASH, LLC**

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CR. NO. 2:08-mj-07-SRW

United States's Second Unopposed Motion to Continue Response Date

The United States and the defense in this case respectfully request the Court continue the due date for the United States's response to the Defendant's Motion to Return Seized Property. The parties request this relief for the following reasons:

1. On February 5, 2008, the Court signed a Search Warrant for Fast Tax Cash, 3026 Buckboard Road, Suite F, Montgomery, Alabama, 36117. The search warrant was executed on or about February 8, 2008. Various items and records were seized in compliance with this Warrant.

2. On February 14, 2008, Loretta Ferguson filed a motion through counsel on behalf of Fast Tax Cash to return seized property. On February 20, 2008, the Court ordered that the parties meet and confer in person or by telephone on or before February 27, 2008, in a good faith effort to narrow the issues or resolve the dispute. On February 22, 2008, counsel for the defendant and the Government conferred about this matter. During the conversation, both parties expressed optimism about resolving the motion without assistance of the Court.

3. On February 27, 2008, at the United States's request, Fergerson's counsel provided a more specific list of the requested items so that the Government could review each request in turn. After reviewing the requests and the documents in this case extensively, the United States and defense counsel continued to contact one another in an attempt to resolve this issue. On Friday, March 14, 2008, the United States provided defense counsel with a copy of over 1000 pages of materials previously seized in response to Fergerson's requests.

4. In a discussion today, Fergerson's counsel indicated that he would like to have an additional two weeks to review the documents and confer with his client in order to determine if they are satisfied with the United States's production. In order to save judicial resources, the United States and the defense would request that the United States be granted a continuance of its response to the Motion for Return of Property in this case until on or after March 31, 2008, so that both parties will have enough time to confer and attempt to resolve this issue informally. At the end of this next response date, the United States will either file a response or Ferguson will withdraw her motion.

Respectfully submitted this 17th day of March, 2008.

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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: George Beck.

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney